

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KEVIN FOOTE (aka Kevin Kelly),
Individually and on behalf of all others
similarly situated;

BRANDON TATE, Individually and
on behalf of all others similarly
situated; and

BRENT TATE, Individually and on
behalf of all others similarly situated;

Plaintiffs,

v.

ALL ELITE WRESTLING, LLC;

IAN RICCABONI; and

TONY KHAN;

Defendants.

Civil Action No. _____

NOTICE OF COMPLIANCE WITH 28 U.S.C. § 1446(d)

To: Kate Barkman, Clerk of Court
U.S. District Court for the Eastern District of Pennsylvania
2609 U.S. Courthouse
601 Market Street
Philadelphia, Pennsylvania 19106-1797

Benjamin J. Baer, Esquire
bbaer@injurylawpartners.com
INJURY LAW PARTNERS
1628 JFK Blvd, Suite 1302

Philadelphia, PA 19103
215-402-2442

Stephen P. New, Esquire
steve@newlawoffice.com
STEPHEN NEW & ASSOCIATES
430 Harper Park Dr.
Beckley, WV 25801
304-250-6017

PLEASE TAKE NOTICE that on October 4, 2024, the Notice of Filing of Notice and Petition for Removal, attached hereto as **Exhibit 1**, was filed with the Prothonotary of the Philadelphia County Court of Common Pleas.

Respectfully submitted,

JACKSON LEWIS P.C.

Dated: October 4, 2024

By: /s/ Daniel F. Thornton
Daniel F. Thornton (PA No. 318431)
daniel.thornton@jacksonlewis.com
Caralyn M. Reese (PA No. 330726)
caralyn.reese@jacksonlewis.com
1601 Cherry Street, Suite 1350
Philadelphia, PA 19102
267-319-7802

B. Tyler White*
tyler.white@jacksonlewis.com
James D. McGuire*
james.mcguire@jacksonlewis.com
501 Riverside Avenue, Suite 902
Jacksonville, FL 32202
904-638-2655

Counsel for Defendants

* *pro hac vice* forthcoming

EXHIBIT 1

JACKSON LEWIS P.C.

BY: Daniel F. Thornton (PA No. 318431)
Caralyn M. Reese (PA No. 330726)

Three Parkway
1601 Cherry Street, Suite 1350
Philadelphia, PA 19102
T: (267) 319-7802
F: (215) 399-2249
daniel.thornton@jacksonlewis.com
caralyn.reese@jacksonlewis.com

BY: B. Tyler White*
James D. McGuire*
501 Riverside Avenue, Suite 902
Jacksonville, FL 32202
904-638-2655
tyler.white@jacksonlewis.com
james.mcguire@jacksonlewis.com

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ATTORNEYS FOR DEFENDANTS

KEVIN FOOTE (aka Kevin Kelly),
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Plaintiffs,

v.

ALL ELITE WRESTLING, LLC;

IAN RICCABONI; and

TONY KHAN;

Defendants.

IN THE COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

Docket No.: 240900115

NOTICE OF FILING OF NOTICE AND PETITION FOR REMOVAL

To: Clerk of Court
Court of Common Pleas, Philadelphia County
1301 Filbert Street
Suite 310 B
Philadelphia, Pennsylvania 19107

Benjamin J. Baer, Esquire
bbaer@injurylawpartners.com
INJURY LAW PARTNERS
1628 JFK Blvd, Suite 1302
Philadelphia, PA 19103
215-402-2442

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steve@newlawoffice.com
STEPHEN NEW & ASSOCIATES
430 Harper Park Dr.
Beckley, WV 25801
304-250-6017

PLEASE TAKE NOTICE that on October 4, 2024, Defendants All Elite Wrestling, LLC, Ian Riccaboni and Tony Khan (“Defendants”) electronically filed a Notice and Petition for Removal of this action with the U.S. District Court for the Eastern District of Pennsylvania with that Court.

PLEASE TAKE FURTHER NOTICE that in accordance with 28 U.S.C. § 1446, Defendants are submitting a true and correct copy of that Notice and Petition for Removal, which is attached hereto as **Exhibit A**, for filing with the Philadelphia County Court of Common Pleas.

Respectfully submitted,

JACKSON LEWIS P.C.

Dated: October 4, 2024

By: /s/ Daniel F. Thornton
Daniel F. Thornton (PA No. 318431)
daniel.thornton@jacksonlewis.com
Caralyn M. Reese (PA No. 330726)
caralyn.reese@jacksonlewis.com

Three Parkway
1601 Cherry Street, Suite 1350
Philadelphia, PA 19102
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james.mcguire@jacksonlewis.com
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Defendants.

IN THE COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

Docket No.: 240900115

CERTIFICATION OF SERVICE

I hereby certify that true and correct copies of Defendants' Notice of Filing of Notice and Petition for Removal and this Certification of Service were served on this 4th day of October, 2024, via the Court's ECF system and electronic mail upon the following counsel of record:

Benjamin J. Baer, Esquire
bbaer@injurylawpartners.com
INJURY LAW PARTNERS
1628 JFK Blvd, Suite 1302
Philadelphia, PA 19103
215-402-2442

Stephen P. New, Esquire
steve@newlawoffice.com
STEPHEN NEW & ASSOCIATES
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Beckley, WV 25801
304-250-6017

Respectfully submitted,

JACKSON LEWIS, P.C.

/s/ Daniel F. Thornton

Daniel F. Thornton (PA No. 318431)

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